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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 Paul Tuttobene,

11 Plaintiff,

12 v.

13 TransUnion, LLC et al,

14 Defendant.

Case No.: 2:19-cv-01999-APG-NJK

**Stipulation and Order to Extend  
Discovery Deadlines**

**(First request)**

16 Paul Tuttobene (“Plaintiff”) and TransUnion, LLC (“Defendant” and together  
17 with Plaintiff as the “parties”), by and through their respective counsel, hereby  
18 stipulate to modify this Court’s scheduling order, to extend the following discovery-  
19 related deadlines by approximately 90 days. This is the parties’ first request and is  
20 not made for an impermissible purpose. The parties hereby stipulate and agree as  
21 follows:

- 22 1. Expert disclosures (initial): from April 8, 2020 to **July 7, 2020**.  
23 2. Expert disclosures (rebuttal): from May 8, 2020 to **August 6, 2020**.  
24 3. Discovery cutoff date: from June 8, 2020 to **September 8, 2020**.  
25 4. Dispositive Motions: from July 7, 2020 to **October 7, 2020**.  
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1 5. Pretrial Order: from August 6, 2020 to **November 6, 2020**. In the event that  
2 dispositive motions are filed, the date for filing the joint pretrial order shall be  
3 suspended until 30 days after decision on the dispositive motions or until  
4 further order of the Court.

5 Pursuant to LR 26-4, good cause exists to amend the scheduling order. The  
6 parties have been diligent in written discovery. The parties have both propounded  
7 written discovery requests and served their initial disclosures. The parties are also  
8 actively working together to schedule each others' depositions, however they agree  
9 that more time is needed given the current need for social distancing that has created  
10 issues in scheduling depositions. The parties have tentatively scheduled Plaintiff's  
11 deposition to take place in mid-June and Trans Union's Rule 30(b)(6) deposition for  
12 the following month.

13 The parties have also had some settlement discussions and further discussions  
14 are expected. This request for an extension is made specifically in this fee-shifting  
15 matter since depositions and experts are a significant expense and settlement  
16 discussions are ongoing. The parties therefore seek to extend the discovery deadlines  
17 by approximately 90 days to finalize written discovery, take depositions, and  
18 disclose experts, as needed.

19 For these reasons, the parties jointly request that this Court modify the  
20 scheduling order to provide an additional 90 days to complete discovery.  
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This is the first request for an extension of these deadlines.

Dated: April 7, 2020.

**KIND LAW**

/s/ Michael Kind

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**QUILLING, SELANDER, LOWNDS, WINSLETT & MOSER, P.C.**

/s/ Jennifer Rebecca Bergh

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*Attorney for TransUnion, LLC*

**SCHEDULING ORDER**

IT IS HEREBY ORDERED that the discovery plan and scheduling order is modified to extend the discovery deadlines as follows:

1. the last date to disclose initial experts shall be **July 7, 2020**;
2. the last date to disclose rebuttal experts shall be **August 6, 2020**;
3. the last date to complete discovery shall be **September 8, 2020**;
4. the last date to file dispositive motions shall be **October 7, 2020**; and
5. the last date to file the proposed joint pretrial order shall be **November 6, 2020**.

IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

DATED: April 9, 2020